

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
THE IT GROUP, INC., <i>et al.</i> ,)	Case No. 02-10118 (MFW)
)	Jointly Administered
Debtors.)	
)	
)	
IT LITIGATION TRUST,)	Civ. A. No. 04-CV-1268 (K.A.J)
)	
Plaintiff,)	
v.)	
)	
DANIEL A. D'ANIELLO, FRANCIS J. HARVEY,)	
JAMES C. MCGILL, RICHARD W. POGUE,)	
PHILLIP B. DOLAN, E. MARTIN GIBSON,)	
ROBERT F. PUGLIESE, CHARLES W.)	
SCHMIDT, JAMES DAVID WATKINS,)	
ANTHONY J. DeLUCA, HARRY J. SOOSE,)	
THE CARLYLE GROUP, THE CARLYLE)	
GROUP L.L.C., CARLYLE PARTNERS II, L.P.,)	
CARLYLE SBC PARTNERS II, L.P., CARLYLE)	
INTERNATIONAL PARTNERS II L.P.,)	JURY TRIAL DEMANDED
CARLYLE INTERNATIONAL PARTNERS III,)	
L.P., C/S INTERNATIONAL PARTNERS,)	
CARLYLE INVESTMENT GROUP, L.P.,)	
CARLYLE-IT INTERNATIONAL PARTNERS,)	
LP, CARLYLE-IT INTERNATIONAL)	
PARTNERS H, L.P., CARLYLE-IT PARTNERS)	
L.P., and T.C. GROUP, L.L.C.,)	
)	
Defendants.)	
)	

**STIPULATION TO FURTHER EXTEND TIME TO REPLY TO
THE LITIGATION TRUST'S OPPOSITION TO DEFENDANTS'
MOTIONS TO DISMISS**

WHEREAS, The IT Group, Inc., *et al.*, filed petitions for relief under Chapter 11 of the Bankruptcy Code on January 16, 2002;

WHEREAS, the Official Committee of Unsecured Creditors (the "Committee") of The IT Group, Inc., *et al.*, on behalf of the Estate of The IT Group, Inc., *et al.*, ("IT Group" or the "Debtors"), commenced Adversary Proceeding No. 04-51336 (MFW) (the "Action") against the above-captioned defendants (the "Defendants");

WHEREAS, pursuant to the First Amended Joint Chapter 11 Plan for the IT Group, Inc. and Its Affiliated Debtors, confirmed by Order of the Court, dated April 5, 2004 (the "Plan"), the Action was transferred to the IT Litigation Trust (the "Litigation Trust");

WHEREAS, on September 1, 2004, by stipulation of all parties and order of the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), the Litigation Trust was substituted as the plaintiff in the Action.

WHEREAS, on September 8, 2004, the United States District Court for the District of Delaware withdrew the reference of the Action to the United States Bankruptcy Court;

WHEREAS, on October 29, 2004, the Defendants filed Motions to Dismiss;

WHEREAS, the Litigation Trust filed a First Amended Complaint on January 28, 2005;

WHEREAS, the Defendants filed Motions to Dismiss on March 2, 2005;

WHEREAS, the Litigation Trust filed its Oppositions to the Defendants' Motions to Dismiss on April 18, 2005;

WHEREAS, the parties stipulated on May 23, 2005 to extend Defendants' time to file memoranda in reply to the Litigation Trust's Opposition to Defendants' Motions to Dismiss to May 27, 2005; and

WHEREAS, the Defendants seek a further extension of time to Defendants' time to file memoranda in reply to the Litigation Trust's Opposition to Defendants' Motions to Dismiss in view of scheduling conflicts, the demands of other matters, and the complexity of this matter,

NOW, THEREFORE, the parties to the Action, by and through their respective undersigned counsel, hereby stipulate and agree as follows, subject to and effective upon the entry of an Order approving all of the terms of this Stipulation:

1. The Defendants' time to file memoranda in reply to the Litigation Trust's Opposition to Defendants' Motions to Dismiss is extended from May 27, 2005 through and including June 3, 2005.

Dated: May 26, 2005

By: /s/Roger D. Anderson
Roger D. Anderson (No. 3480)
SMITH, KATZENSTEIN & FURLOW LLP
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899
(courier 19801)
302.652.8400 (phone)
302.652.8405 (fax)

Charles A DeMonaco
Kimberly L. Haddox
DICKIE, McCAMEY & CHILCOTE, P.C.
Two PPG Place Suite 400
Pittsburgh, PA 15222-5402
412.281.7272 (phone)
412.392.5367 (fax)

Attorneys for Defendant Harry J. Soose, Jr.

By: /s/Ronald S. Gellert
Ronald S. Gellert (No. 4259)
ECKERT SEAMANS CHERIN
& MELLOTT, LLC
4 East 8th Street - Suite 200
Wilmington, DE 19801
302.425.0430 (phone)
302.425.0432 (fax)

Mark A. Willard
Paul D. Steinman
ECKERT SEAMANS CHERIN
& MELLOTT, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
412.566.6000 (phone)
412.566.6099 (fax)

Attorneys for Defendant Anthony J. DeLuca

By: /s/ Marcos A. Ramos

Mark D. Collins (No. 2981)
Marcos A. Ramos (No. 4450)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
P. O. Box 551
Wilmington, DE 19899
302.651.7700 (phone)
302.651.7701 (fax)

*Attorneys for Defendants Daniel A. D'Aniello,
Francis J. Harvey, James C. McGill, Richard
W. Pogue, Philip B. Dolan, E. Martin Gibson,
Robert F. Pugliese, Charles W. Schmidt, James
David Watkins, The Carlyle Group, The
Carlyle Group L.L.C., Carlyle Partners II,
L.P., Carlyle SBC Partners II, L.P., Carlyle
International Partners II, L.P., Carlyle
International Partners III, L.P., C/S
International Partners, Carlyle Investment
Group, L.P., Carlyle-IT International Partners,
L.P., Carlyle-IT International Partners II, L.P.,
Carlyle-IT Partners, L.P., and T.C. Group,
L.L.C.*

Thomas L. Patten
David A. Becker
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, DC 20004
202.637.2200 (phone)
202.637.2201 (fax)

Laurie B. Smilan
LATHAM & WATKINS LLP
11955 Freedom Drive
Suite 500
Reston, VA 20190
703.456.1000 (phone)
703.456.1001 (fax)

By: 

Jeffrey M. Schlerf (No. 3047)
Thomas H. Koyach (No. 3964)
Eric M. Suty (No. 4007)
THE BAYARD FIRM
222 Delaware Avenue
P. O. Box 25130
Wilmington, Delaware 19899
302.655.5000
302.658.6395 (fax)

-and-

Richard S. Wayne
Thomas P. Glass
STRAUSS & TROY, LPA
The Federal Reserve Building
150 E. Fourth Street
Cincinnati, Ohio 45202-4018
513.621.2120 (phone)
513.629.9426 (fax)

Attorneys for the IT Litigation Trust

IT IS SO ORDERED,

This ____ day of _____, 2005

UNITED STATES DISTRICT JUDGE